

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

AT HUNTINGTON

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:11-00074-01

BASIM ALI TALOUZI

SECOND SUPPLEMENTAL RESPONSE OF THE UNITED STATES OF AMERICA  
TO DEFENDANT'S STANDARD DISCOVERY REQUESTS

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, Rule 16.1(a) of the Local Rules of Criminal Procedure, and the Arraignment Orders and Standard Discovery Requests entered by the Court in this case on March 9, 2011, the United States of America, by counsel, herewith responds to each of defendant's Standard Discovery Requests as follows:

**Request E: Permit the defendant to inspect and to copy or photograph books, papers, documents, data, photographs, tangible objects, building or places, or copies or portions of any of those items, if the item is within the government's possession, custody or control, and (i) the item is material to preparing the defense; (ii) the government intends to use the item in its case-in-chief at trial; or (iii) the item was obtained from or belongs to defendant. [Fed. R. Crim. P. 16(a) (1) (E)]**

**Response:**

The United States is providing a copy of defendant's bank records obtained from BB&T and a copy of defendant's financial affidavit filed with the Court on March 3, 2011.

Any discovery provided that is not mandated by Court order, the Federal Rules of Criminal Procedure, federal statute or federal case law, is provided voluntarily as a matter of discretion solely to expedite and facilitate litigation of this case.

Respectfully submitted,

R. BOOTH GOODWIN II  
United States Attorney

By:

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CERTIFICATE OF SERVICE

It is hereby certified that service of the foregoing "SECOND SUPPLEMENTAL RESPONSE OF THE UNITED STATES OF AMERICA TO DEFENDANT'S STANDARD DISCOVERY REQUESTS" has been electronically filed and service has been made on opposing counsel by virtue of such electronic filing and U.S. mail on this 27th day of May 2011, to:

Tim C. Carrico, Esquire  
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s/CHARLES T. MILLER  
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